

No. 22-16826

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

TGP Communications LLC, *et al.*

Plaintiffs-Appellants

v.

Jack Sellers, *et al.*,

Defendants-Appellees

On Appeal from the United States District Court
for the District of Arizona
No. 2:22-cv-1925 (JJT)
The Honorable John J. Tuchi

**MOTION FOR LEAVE TO FILE BRIEF FOR
WE THE PEOPLE – HARTFORD
AS AMICUS CURIAE IN SUPPORT OF PLAINTIFFS-APPELLANTS**

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MOTION FOR LEAVE TO FILE BRIEF

The blog known as We the People – Hartford (“WPH” or “blog”), addressed at wethepeoplehartford.blogspot.com, moves for leave to file an amicus curiae brief supporting the Plaintiffs-Appellants. The motion should be granted because the blog faces discrimination of a similar character, as non-traditional media critical of local government, and the blog is concerned about the development of the law in this case.

Started in 2008, the focus of the blog is municipal government in Hartford, Connecticut. The blog has been instrumental in bringing to light corruption and bad practices in Hartford, be it uncovering evidence critical to the conviction of former Mayor Eddie Perez in 2010 and again in 2017, or exposing the Hartford Police practice of the “Deadpool,” where officers and detectives would bet on where the year’s first murder would occur. Much of the information comes from anonymous tips by government employees, in comments or to Brookman directly. This muckraking practice has drawn the ire of entrenched interests. Because the blog is not a mainstream news source, the blog has not been afforded the same protections and privileges afforded to more institutionalized and corporate media news sources like the Hartford Courant.

WPH offers only a few salient points that it believes have not been addressed by any party or amicus. First, WPH will address the untenable double

standard applied to non-traditional media as concerns actions by disturbed individuals. Second. WPH will briefly address the policy concern over traditional media and government aligning to budge out new media. Third, WPH will address why reassignment is appropriate on remand under *Institute of Cetacean Research v. Sea Shepherd Conservation Society*, 725 F.3d 940 (9th Cir. 2013).

Conclusion

For the foregoing reasons, WPH requests the Court grant its motion for leave to file the attached brief as amicus curiae supporting the Plaintiff.

December 16, 2022

Respectfully submitted,

/s/ Mario Cerame

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CERTIFICATE OF COMPLIANCE

I certify that to the best of my knowledge and ability that this motion complies with the requirements of Federal Rules of Appellate Procedure 27(d)(2) and 32(c) because it uses a proportionately spaced Times New Roman font, has a typeface of 14 points, and contains 305 words.

December 16, 2022

/s/ Mario Cerame

Mario Cerame

CERTIFICATE OF SERVICE

I certify that on December 16, 2022, I electronically filed the foregoing document with the Clerk of the Court of the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system. I certify that all other participants in this case are registered CM/ECF users and that service will be effected by the appellate CM/ECF system.

December 16, 2022

/s/ *Mario Cerame*
Mario Cerame